

1 THAD A. DAVIS (SBN 220503)  
2 thad.davis@ropesgray.com  
3 ROCKY C. TSAI (SBN 221452)  
4 rocky.tsai@ropesgray.com  
5 ROPES & GRAY LLP  
6 Three Embarcadero Center, Ste 300  
7 San Francisco, California 94111-4006  
8 Tel: (415) 315-6300  
9 Fax: (415) 315-6350

10 HARVEY J. WOLKOFF  
11 harvey.wolkoff@ropesgray.com  
12 MARK P. SZPAK  
13 mark.szpak@ropesgray.com  
14 LARA A. ORAVEC  
15 lara.oravec@ropesgray.com  
16 ROPES & GRAY LLP  
17 Prudential Tower, 800 Boylston Street  
18 Boston, MA 02199-3600  
19 Tel: (617) 951-7606  
20 Fax: (617) 235-0215

21 Attorneys for Defendants

22  
23  
24  
25  
26  
27  
28  
UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

JAY KATZ, Individually and on Behalf of All  
Others Similarly Situated,

Plaintiff,

v.

SONY COMPUTER ENTERTAINMENT  
AMERICA LLC and SONY NETWORK  
ENTERTAINMENT INTERNATIONAL LLC,

Defendants.

Case No. 3:11-cv-02229-EDL

**STIPULATION TO EXTEND  
TIME FOR DEFENDANTS TO  
MOVE, ANSWER, OR  
OTHERWISE RESPOND TO  
COMPLAINT**

Judge: Magistrate Judge Elizabeth D.  
Laporte

WHEREAS, defendants Sony Computer Entertainment America LLC (“SCEA”) and  
Sony Network Entertainment International LLC (“SNEI”), as well as certain related entities

STIPULATION TO EXTEND TIME FOR DEFENDANTS TO  
RESPOND TO COMPLAINT  
CASE NO. 3:11-cv-02229-EDL

1 (collectively, the “Sony Defendants”), have been named as defendants in at least twenty-one (21)  
2 putative class action lawsuits within this District, to date;

3 WHEREAS, certain of the Sony Defendants have also been named as defendants in at  
4 least eighteen (18) putative class action lawsuits pending outside this District, to date;

5 WHEREAS, a motion is currently pending before the Judicial Panel on Multidistrict  
6 Litigation (the “JPML”) to centralize this and other matters, to which one response has been filed  
7 to date, and as to which other responses, including Sony Defendants’ response, are due by June 2,  
8 2011.

9 WHEREAS, the current deadlines for SCEA and SNEI to respond to the Complaint are  
10 May 31, 2011 and June 1, 2011, respectively;

11 WHEREAS, the parties have agreed to the extension of time herein for the defendants in  
12 the above-captioned action to move, answer, or otherwise respond to the Complaint, in order to  
13 facilitate the scheduling of this matter in coordination with the schedule for the motion before the  
14 JPML;

15 NOW, THEREFORE, pursuant to Civil Local Rules 6-1(a), 7-1(a), and 7-12, all parties,  
16 by and through their respective counsel, hereby stipulate as follows:

17 The deadline for the defendants to respond to the Complaint in the above-captioned action  
18 is extended until and including 30 days after a consolidated complaint is filed in a multidistrict  
19 litigation centralizing the above-captioned action with other matters, or if centralization is denied  
20 by the JPML, then 30 days from the date of such order denying centralization.

21

22

23

24

25

26

27

28

1 Dated: May 16, 2011

MICHELE M. DESOER  
MARC A. WITES  
WITES & KAPETAN, P.A.

4 By: /s/ Michele M. Desoer /s/ [as authorized]  
5 Michele M. Desoer

6 Attorneys for Plaintiff  
7 JAY KATZ

8 Dated: May 16, 2011

9 HARVEY WOLKOFF  
10 THAD A. DAVIS  
11 ROCKY C. TSAI  
12 ROPES & GRAY LLP

13 By: /s/ Rocky C. Tsai /s/  
14 Rocky C. Tsai

15 Attorneys for Defendants  
16 SONY COMPUTER  
17 ENTERTAINMENT AMERICA LLC;  
18 SONY NETWORK ENTERTAINMENT  
19 INTERNATIONAL LLC

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

20 Dated: May 18, 2011

21 By: U. S. D.   
22 Judge Elizabeth D. Laporte

